

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Office of Engineering and	)	
Technology Seeks Comment On	)	ET Docket No. 19-48
Modifying the Equipment Authorization	)	
Rules to Reflect the Updated Versions	)	
Of the Currently Referenced	)	
ANSI C63.4 and ISO/IEC 17025	)	

Comments of Sony Electronics

Sony Electronics (“Sony”) respectfully submits the following brief comments on the Public Notice in the above-referenced proceeding.<sup>1</sup> Sony supports the Commission’s proposal to incorporate ANSI C63.4a-2017 into its rules, and asks that the Commission allow test sites two years to comply with the amended standard.

Sony supports updating the Commission’s test site validation standard to the most current version, ANSI C63.4-2014 as amended by ANSI C63.4a-2017. Device manufacturers will benefit from the guidance provided for measurement of equipment under test of up to 3 meters in height, as well as the from various additional corrections and clarifications that the amendment provides.<sup>2</sup>

Sony requests, however, that the Commission give test sites ample time to meet the new requirement. Although the Commission’s Canadian counterpart ISED has set the deadline for

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<sup>1</sup> *Office Of Engineering and Technology Seeks Comment on Modifying the Equipment Authorization Rules to Reflect the Updated Versions of the Currently Referenced ANSI C63.4 and ISO/IEC 17025 Standards*, Public Notice, ET Docket No. 19-48, 84 Fed. Reg. 20,088 (2019).

<sup>2</sup> American National Standards Institute, Accredited Standards Committee C63 (ASC 63) comments at 3-4.

compliance to September 30, 2020,<sup>3</sup> Sony believes that a mere 15 months of lead time might not be sufficient here in the U.S. Test sites will need ample time to understand the various changes made in the amendment, and to alter their test setups accordingly. Accordingly, Sony recommends a minimum phase-in period for the amended standard of two years.

Respectfully Submitted,

/s/ \_\_\_\_\_  
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<sup>3</sup> Innovation, Science and Economic Development Canada, Normative Test Standards and Acceptable Alternate Procedures, available at [https://www.ic.gc.ca/eic/site/ceb-bhst.nsf/eng/h\\_tt00094.html](https://www.ic.gc.ca/eic/site/ceb-bhst.nsf/eng/h_tt00094.html) (last visited June 5, 2019).